

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

JULIE CLARIDGE and HELEN MARSH, on
behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

NORTH AMERICAN POWER & GAS, LLC,

Defendant.

Civil Action

Case No: 15-cv-1261

**NOTICE OF MOTION
FOR PLAINTIFFS' MOTION FOR CLASS CERTIFICATION**

Plaintiffs Julie Claridge and Helen Marsh hereby move, pursuant to Fed. R. Civ. P. 23, for an Order: (1) certifying a class of all New York North American Power & Gas, LLC customers who paid North American Power & Gas, LLC's variable rate; and (2) appointing Plaintiffs and their counsel as Class Representatives and Class Counsel respectively.

In support of this motion, Plaintiffs submit the accompanying memorandum of law, Declaration of D. Greg Blankinship, Declaration of Matthew Mendelsohn, Declaration of Matthew D. Schelkopf, and the Expert Report of Dr. Frank A. Felder.

Dated: White Plains, New York
April 22, 2016

FINKELSTEIN, BLANKINSHIP, FREI-
PEARSON & GARBER, LLP

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